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7 *Attorneys for Defendant SquareTwo*  
*Financial Commercial Funding*  
 8 *Corporation*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 RODNEY MORRIS, on behalf of himself and  
 all similarly situated persons,

12 Plaintiffs,

13 v.

14 CACH, LLC, a Colorado Limited Liability  
 15 Company; SQUARETWO FINANCIAL  
 COMMERCIAL FUNDING  
 16 CORPORATION, a Delaware Corporation;  
 DOES I-V inclusive and ROE Corporations  
 17 VI-X, inclusive,

18 Defendants.

Case No. 2:13-cv-00270-APG-GWF

**JOINT REQUEST IN RESPONSE  
 TO COURT'S ORDER #25  
 CONCERNING LR 26-1  
 OBLIGATIONS AND PROPOSED  
 ORDER THEREON**

19  
 20 Defendant SquareTwo Financial Commercial Funding Corporation  
 21 ("SquareTwo"), by and through its attorneys of record, Abran Vigil and Edward  
 22 Chang of the law firm Ballard Spahr LLP, Defendant CACH, LLC ("CACH") by and  
 23 through it's attorneys of record J. Christopher Jorgensen and Meng Zhong of the law  
 24 firm Lewis and Roca LLP, and Plaintiff Rodney Morris ("Morris") by and through his  
 25 attorneys of record Craig B. Friedberg and Brian L. Bromberg respond to the Court's  
 26 Order (#25) and jointly request certain limited relief as follows:

The court has ordered that the parties file a proposed Stipulated Discovery Plan and Scheduling Order in compliance with LR 26-1 no later than July 18, 2013. [Dkt #25]. The parties, through counsel, conducted the 26(f) conference on July 15, 2013.

Based on motion practice that is pending and yet to be completed, the parties have agreed to jointly request that the Court temporarily stay all Rule 26 obligations until 30 days after briefing is concluded on the pending Motion to Amend/Correct Complaint [Dkt. 21], Motion to Dismiss [Dkt. 22], Response to Motion to Amend/Correct Complaint [Dkt. 24], Joinder to Response to Motion to Amend/Correct Complaint [Dkt. 26], and Joinder to Motion to Dismiss [Dkt. 27], or until the court rules on the motions, whatever is shorter.

The parties further request that the court allow them to, within 10 days after the court rules on the pending motions, or alternatively, 10 days after the 30 days after briefing is complete lapses, submit a discovery plan and scheduling order to the court that will otherwise comply with the deadlines set forth in Rule 26-1.

IT IS SO STIPULATED AND JOINTLY REQUESTED.

Dated this 15<sup>th</sup> day of July, 2013.

<p>BALLARD SPAHR, LLP</p> <p>By: <u>/s/ Abran E. Vigil</u>  Abran E. Vigil  Nevada Bar No. 7548  Edward Chang  Nevada Bar No. 11783  100 North City Parkway, Suite 1750  Las Vegas, Nevada 89106</p> <p><i>Attorneys for Defendant SquareTwo  Financial Commercial Funding  Corporation</i></p>	<p>LEWIS AND ROCA, LLP</p> <p>By: <u>/s/ J. Christopher Jorgensen</u>  J. Christopher Jorgensen, Esq.  Meng Zhong, Esq.  LEWIS AND ROCA LLP  3993 Howard Hughes Parkway,  Suite 600  Las Vegas, Nevada 89169</p> <p><i>Attorneys for Defendant CACH, LLC</i></p>

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LAW OFFICES OF CRAIG B.  
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By: /s/ Craig B. Friedberg  
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*and*

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Attorneys for Plaintiffs

**IT IS SO ORDERED.**

\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE

Dated: \_\_\_\_\_

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